

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN</b>	:	
	:	
<b>and</b>	:	
	:	
<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN'S MOTION  
TO COMPEL RECORDS**

Defendant Rafiekian, through counsel, respectfully requests that the Court order the government to produce all statements, transcripts, notes, records, and memoranda that incorporate, recite, or reflect statements made by Michael T. Flynn to any agent, employee, representative, or elected official of the United States government. The grounds for this motion are set forth in the accompanying memorandum of law.

Defendant respectfully requests that the Court hear this motion on its next motion day, March 8, 2019.

Respectfully submitted,

/s/ \_\_\_\_\_  
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/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 1st day of March 2019, a true and genuine copy of Defendant's Motion to Compel and Memorandum of Law was sent via electronic mail by the Court's CM/ECF system to the following:

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/s/

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